

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF:**

**LEONTYNE KELLY JONES**

**CHAPTER 13:**

**CASE NO. 25-00124 JAW**

**TRUSTEE'S RESPONSE TO  
DEBTOR'S MOTION TO INCUR DEBT**

COMES NOW, Semoune Ellis on behalf of Torri Parker Martin, the duly appointed and qualified Standing Trustee, in the above cause and files this Response to the Debtor's Motion to Incur Debt (Docket #27) and in support thereof, would show unto the Court the following:

1. The Debtor is requesting permission from the Court to incur student loan debt in the amount of \$6,000.00, to be disbursed in the amount of \$2,000.00 per semester.
2. Based on the Trustee's inquiry, related to the Motion, the Debtor intends to enroll in the Fall 2025, Winter 2026, and Summer 2026 semesters.
3. The Debtor's confirmed plan provides to pay one hundred percent (100%) percent, an estimated payment of \$21,604.00, to unsecured creditors over the sixty-month (60) plan term (Docket #20). The proposed nonpriority unsecured debt total is \$6,343.00.
4. The Debtor's plan payments are current.
5. The Debtor's Motion provides the Debtor shall repay the student loan debt directly to the lender in accordance with the terms of their agreement.
6. The Trustee believes it is in the best interest of the bankruptcy estate to require the Debtor to provide documentation of when the loan repayment will commence.

**WHEREFORE, PREMISES CONSIDERED,** the Trustee prays that this Response be

received and considered and at the hearing hereon the Debtor's Motion to Incur Debt, should the Debtor's Motion be granted, require the Debtor to provide documentation of the loan agreement and the loan repayment commencement date; and any other general relief to which the Trustee and this bankruptcy estate may be entitled.

DATED: August 5, 2025

Respectfully Submitted,

/s/ Semoune Ellis  
 Semoune Ellis, MSB# 105303  
 Staff Attorney for  
 Standing Chapter Thirteen Trustee  
 Torri Parker Martin, MSB# 103938  
 200 North Congress Street, Suite 400  
 Jackson, MS 39201  
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#### CERTIFICATE OF SERVICE

I, Semoune Ellis, do hereby certify that I have this day submitted a true and correct copy of the above and foregoing Response to the following, all by U.S. Mail, postage prepaid, and/or electronic, ECF filing, to: Abigail Marbury, Asst. U. S. Trustee, USTPRegion05.JA.ECF@usdoj.gov, 501 E. Court Street, Suite 6.430, Jackson, MS 39201, and

#### Attorney for Debtor:

Thomas C. Rollins, Jr., MSB# 103469  
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 Jackson, MS 39236  
 Office: 601-500-5533  
 Email: [trollins@therollinsfirm.com](mailto:trollins@therollinsfirm.com)

DATED: August 5, 2025

/s/Semoune Ellis  
 Semoune Ellis